

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

DATE: June 6, 1995

SUBJECT: USS Lead--Interim Stabilization Measures Workplan
Volumes I--Revised June 4, 1995

FROM: Fred Micke, P.E., RPM
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TO: Mirtha Capiro
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I have the following comments regarding the Revised Interim Stabilization Measures Workplan (Workplan) prepared by Entact, Inc.:

1) **Section 1.4.5, page 8:** It is stated on page 8 of Section 1 that IT Corp. conducted an XRF survey in 1993. How confident are we, as an Agency, that the results obtained by IT Corp. are accurate? If the results obtained are inaccurate, the basis for the CAMU could be in error.

The February 14, 1995 response from Entact (page 2) states that no IT XRF Report exists. Why is this the case? MRRC paid for the work; why shouldn't MRRC have a Report?

2) **Section 2.5, page 5:** The discussion of the excavation of the canal must be expanded. The May 22, 1995 response from Entact leaves many questions.

The effectiveness of the silt fence to properly stop the migration of lead into the lower reaches of the canal or into the Grand Calumet River is very questionable. Entact must do a better job of supporting their case.

The use of a temporary dam to isolate the work area should be looked into. This would remove the possibility of lead moving off-site and would likely make dewatering of the sediments easier.

3) **Section 5.2, page 4:** The vibrating beam slurry wall method should be presented as an option. The vibrating beam method may cost less than the conventional method. In addition, the vibrating beam method is likely faster to construct and the slurry mixing area will take up less area than a conventional slurry wall. [This issue was discussed at the May 24, 1994 meeting with Entact and MRRC. However, no discussion is included in the Revised Workplan.]

4) **Section 2.7, page 5:** Off-site lead contamination needs to be addressed at some point in time. The Workplan evades this issue.

General comment: The slurry wall and cap details item look suitable as far as they go in the workplan. However, the design will need to be reviewed meticulously in order to make this CAMU work.

The draft comments you prepared look very good. They made my job much easier. Thanks much!